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July 30, 2018

VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street – Courtroom 17C
New York, New York 10007-1312

**Re: Correction Officers' Benevolent Association et. al. v.
City of New York, et al. 17 v. 2899 (LTS)**

Dear Judge Swain:

We are counsel to the Plaintiffs in the above referenced matter. By Order dated June 26, 2018, the Court extended the deadline for Plaintiffs to file a Motion for Leave to Amend the Complaint to Friday, August 3, 2018. We write to respectfully request a second extension of this deadline, to **September 7, 2018**, for the reasons identified below. Counsel for the City, Alan Schlesinger, has kindly consented. We also note that an initial pre-trial conference had been scheduled in this matter prior to the Court's decision on the Motion to Dismiss. To the extent that the August 10, 2018, date may still be on the calendar, we respectfully and jointly request an adjournment of same.

The parties have been engaged in ongoing discussions concerning the working conditions within the City Jails. As it relates the re-filing of this lawsuit, Defendants provided Plaintiffs with a significant amount of information regarding violence occurring in the Jails, most recently a 2017 workplace violence report issued Friday, July 27, 2018. A follow-up meeting between the parties is also scheduled for August 9, 2018. It is anticipated that matters related to this lawsuit will be discussed at that time. As the recent exchange of information and outcome of the parties' discussions and meetings are highly relevant to the re-filing of this lawsuit, we respectfully ask the Court to extend Plaintiffs' time to file its Motion for Leave to Amend.

In the event Plaintiffs file a Motion for Leave, the City indicates it would like to first review the proposed First Amended Complaint and determine whether or not to request an opportunity to oppose the Motion. To that end, the parties would also like to request the Court's permission to submit a

briefing schedule at a later date in the event the City decides it will oppose the Motion for Leave.

Thank you for your time and attention to this request.

Respectfully submitted,

KOEHLER & ISAACS LLP

By: Cynthia Devasia
Cynthia Devasia, Esq.

cc: Alan Schlesinger, Esq. (via *ECF*)